

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



US EPA RECORDS CENTER REGION 5



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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

9/3 - Concurred in this
after consultation
w/ Erica Dolgin at
DOT.

MEMORANDUM

SUBJECT: Cooperative Agreement with the State of Minnesota for Remedial
Actions and Studies at the Reilly Tar and Chemical Site

FROM: William N. Hedeman, Jr., Director
Office of Emergency and Remedial Response (WH-548)

TO: Rita M. Lavelle, Assistant Administrator
for Solid Waste and Emergency Response (WH-562A)

Attached to this memorandum are the documents necessary to support the award of Federal funds through a cooperative agreement to the State of Minnesota for remedial actions and studies at the Reilly Tar and Chemical Company site, St. Louis Park, Minnesota. The State's application for Federal funding was filed with the Agency on August 25, 1982. The project objectives, budget, and scope of work proposed by the State of Minnesota have been reviewed by this Office and the Office of General Counsel, and are satisfactory. I request that you approve the award by signing the documents described below.

In the Action Memorandum requesting approval for this project, it was noted that EPA was in the process of determining if the State had to pay a 10 percent or 50 percent cost share. Although a State subdivision currently owns the facility, such ownership began after dumping at the site had ceased. Accordingly, we have determined that a 10 percent State cost share is permissible and appropriate in this case.

As the Decision Official for the cooperative agreement, you must sign three documents: (1) a memorandum to the Award Official in the Grants Administration Division (GAD) transmitting the appropriate documents and recommending award of the cooperative agreement; (2) the Grant Funding Order which includes the Superfund program conditions for the cooperative agreement; and (3) the Commitment Notice. The entire package will then be transmitted to the GAD Award Official for preparation of the cooperative agreement offer of award. The cooperative agreement will be signed by the Award Official and mailed to the State for acceptance.

If you have questions on this package, I will be happy to meet with you.

Attachments

REVISED: C. CHERNEY (8-26-82)

Kathy
WH-548E

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 17 1982

SUBJECT: Decision Memorandum, Cooperative Agreement with the State of Minnesota
for Work at the Reilly Tar & Chemical Site, St. Louis Park, Minnesota

FROM: Valdas V. Adamkus
Regional Administrator

TO: William H. Hedeman, Jr., Director
Office of Emergency & Remedial Response (WH 548)

I. Objectives

This memorandum proposes three major activities for the Reilly Tar & Chemical site, St. Louis Park, Minnesota. This is the State's highest priority site with a Mitre score of 55.77. One activity is a remedial action to initiate a well abandonment program. The attached scope of work proposes to abandon nine wells that have been previously prioritized according to their extent of contamination and threat to public health. They will be permanently plugged or reconstructed to prevent the continual transmission of contamination from the higher aquifers to the lower drinking water aquifers. Similarly, to be consistent with the objectives of the Minnesota Department of Health (MDH) and the Minnesota Pollution Control Agency (MPCA) in protecting public health, the proposed Cooperative Agreement requests funds to continue a survey of off-site wells, that are located further from the source material, in order to ascertain the degree of contamination. Subsequently, these wells surveyed through this proposed Cooperative Agreement will be evaluated and prioritized for abandonment if found to be significantly contributing to the transportation of contaminants to drinking water aquifers. A total of 40 wells may be scheduled for abandonment funds pending the outcome of the survey and cost-effectiveness analysis.

The second major activity is the testing of the gradient control well system which has been proposed under previous State funded studies. The purpose of testing this system is to provide data critical to the precise location and correct operating parameters for the wells. Field testing, monitoring, and analytical instrumentation could be expensive, so it is proposed to utilize an existing computer model to hydraulically and chemically test the effectiveness of the proposed wells. After the model is executed and checked, field testing will occur to confirm the operating parameters by in situ testing of the gradient control well effluent at the locations prescribed by the model.

The third major activity proposed for funding is the study of the source material. The soils in the area and the uppermost aquifer contain large amounts of contaminants. These contaminants are being dissolved and transported into various aquifers, some of which serve as drinking water sources. This activity will determine the extent of contamination and look at treatability of the source material in the cost-effectiveness analysis. An environmental impact analysis will be performed on all alternatives considered for implementation. As a result of this feasibility study, a comprehensive solution to the remaining problems at the Reilly Tar and Chemical site will be produced.

II. Relationship of the Project to the Superfund Program Mission

The methodology presented herein is consistent with the July 16, 1982, National Contingency Plan and Superfund Program Guidance on preparation of State/EPA Cooperative Agreements under the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA).

This proposed Cooperative Agreement will accomplish, through the Well Abandonment Program, the necessary remedial action to stop the main route of contaminant transport to drinking water aquifers. It will determine the overall extent of storage of contaminants in the soils on and beneath the Reilly Tar site and test various treatment methodologies for removal of the contaminants from the soils. A report will delineate the cost-effectiveness of various soil treatment/removal alternatives which will be submitted for MPCA/USEPA review.

III. Explanation of any Apparent Duplication of Effort

The State of Minnesota, MPCA and MDH, have continually taken the lead on previous actions at the Reilly Tar site for the last 20 years.

The attached Cooperative Agreement has been reviewed by Region V and is consistent with the technical approaches established in conjunction with the State Agencies. The Agreement is directed toward a comprehensive cleanup solution that can be cost-effectively implemented at the site.

IV. Recommendation

We recommend that the proposal be funded in order to begin work this summer. The MPCA has realized the urgency of the timeliness of this proposal by hiring another full time Chemical Engineer to work solely on the Reilly Tar project and proposes to hire two additional professional staff after the Cooperative Agreement is signed.

V. Reviews

Region V Counsel has reviewed the attached Cooperative Agreement and has determined that it does not duplicate or conflict with the enforcement activities at the site.

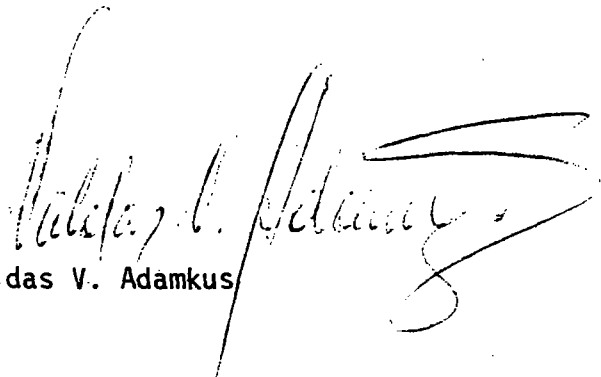
VI. Project Coordinators

The Project Coordinators responsible for the technical and administrative aspects outlined in the Cooperative Agreement are:

USEPA Region V
Paul Bitter, On-Scene Coordinator
USEPA 5HR-TUB
111 West Jackson Blvd.
Chicago, Illinois 60604
8-886-3007

Michael Hansel, Chemical Engineer
Division of Solid Waste, MPCA
1935 W. County Road, B-2
Roseville, Minnesota 55113

Attachment



Valdas V. Adamkus